



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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Ms. Julia A. Jones, Esq.  
WGR Operating, LP  
1099 18<sup>th</sup> Street, Suite 1800  
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Re: Request for further information regarding WGR Operating, LP's (WGR's) March 31 and April 14, 2016 Responses to the United States Environmental Protection Agency's (EPA's) CAA section 114 Request for Information (RFI)

Thank you for your responses to the EPA's Request for Information (RFI) submitted on March 31, 2016 and April 14, 2016. This letter is intended to identify certain information that was requested and either not provided in WGR's response to the RFI or not fully responsive to the information being sought by the EPA in its requests. Please review the following concerns and submit your response to this letter by June 17, 2016.

1. The March 31, 2016 Response failed to submit the certification provided in Enclosure 3 of EPA's March 7, 2016 CAA 114 RFI. Please provide the requested certification.
2. **RFI #4:** Please provide the state, local and federal leak detection and repair (LDAR) regulations and LDAR permit provisions to which each process was subject to during the 5 years prior to the date of the RFI.

WGR indicated that such information was provided in the Annual Compliance Certifications. The Annual Compliance Certifications appear to address Granger's compliance with NSPS KKK<sup>1</sup> generally, and not per process. These Certifications also address MACT HH<sup>2</sup>. It is not clear whether Granger is certifying compliance with the ancillary equipment requirements of MACT HH. Given the vagueness of the Annual Compliance Certifications relative to the EPA's

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<sup>1</sup> NSPS KKK refers to the New Source Performance Standards, specifically Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011.

<sup>2</sup> MACT HH refers to Maximum Achievable Control Technology standards, specifically, National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.

RFI, the EPA cannot discern with certainty, the applicable regulations and LDAR permit provisions applicable to each process.

3. **RFI #5:**

(a) Please provide Process and Instrumentation Diagrams (P&ID) showing all process streams at the Granger Gas Plant and indicate on the P&ID whether each stream is **in volatile organic compound (VOC) service, in volatile hazardous air pollutant (VHAP) service, and/or in wet gas service**, as defined in the EPA's March 7, 2016 CAA RFI.

The EPA had requested WGR to provide a color-coded plot plan of the Granger Gas Plant indicating which areas of the Plant are in VOC service, in VHAP service, or in wet gas service and provide the demonstration or determination required by 40 CFR 60.485(d), 60.485a(d), or 63.772(a) for those components not in VOC service or not in VHAP service. WGR indicated that although they would provide a plot plan they would not color-code the plot plan because a plot plan is general, may result in misinterpretations and does not meet the regulatory requirements for conveying information identifying "areas of the Plant in VOC service." Therefore, the EPA requests WGR to provide more detailed P&ID showing all process streams at the Granger Gas Plant and indicate on the P&ID whether each stream is **in VOC service, in VHAP service, and/or in wet gas service**, as defined in the EPA's March 7, 2016 CAA RFI. Note, regardless of whether WGR views the Granger Gas Plant as an area source under MACT HH, the EPA is still requesting WGR to identify streams **in VHAP service** at the Granger Gas Plant.

(b) The stream compositions provided in the response to RFI #5 list the Mass Fraction for "Nonane." The mass fraction of Nonane exceeds 39% for at least one process stream. When conducting stream composition analyses, some analytical methods do not separate out compounds with higher molecular weights or compounds with higher carbon counts. Instead, these test methods combine heavier compounds together and report them as one number. Please identify the test method(s) used in providing the response to RFI # 5 and state whether the test method(s) employed combine(s) materials heavier than Nonane with Nonane. Additionally, please provide any and all data that provides stream composition information for compounds heavier than Nonane.

4. **RFI #6:** Please provide the stream compositions for all 21 streams in the LDAR database "ProductStream" table. If any of the 11 streams identified in the Table provided in response to RFI #5 overlap with the 21 streams identified in the "ProductStream" table in the LDAR database, indicate to which of the 21 streams the stream composition data provided in response to RFI #5 corresponds.

The EPA requested the chemical composition for each process stream associated with equipment in the LDAR database. WGR indicated that we should look at the response to RFI #5. The response to RFI #5 provided a table titled "Granger Gas Plant Stream Compositions," and contains stream compositions for 11 streams. However, the LDAR database contains a table titled "ProductStream," which lists 21 streams. Each of these 21 streams are associated with equipment in the LDAR database. See "Component" table in LDAR database.

5. **RFI #7:** Please provide the additional information requested in (a) through (e) below. The EPA requested information regarding the date(s) when equipment was installed at the Plant between

August 23, 2011, and the date of the RFI, WGR indicated that the requested information was either in Appendix A, Appendix D, or not readily available.

- a. For all responses that indicate that “information is not readily available, please describe the search you conducted for the requested information, state whether such information exists, and explain why it is “not readily available.”
  - b. With respect to the “Flare 2012” project, the Capital Expenditure table (Appendix D – Part II, Page 11 of 11) indicates that only one pump was added. However, The LDAR database and Appendix D – Part I indicate that two pumps were added on July 1, 2012. Please explain why the Capital Expenditure calculations only show the addition of one pump. Additionally, the LDAR database and Appendix D – Part I show that a PRV was added during the Flare 2012 project, yet the Capital Expenditure table (Appendix D – Part II) does not include the added PRV. Please explain.
  - c. With respect to the “Frac 2016” project, the LDAR database and Appendix D – Part I indicate that a pump was added during the project. However, the Capital Expenditure table (Appendix - Part II) does not include the pump. Please explain why the pump was not included in the Capital Expenditure calculations.
  - d. Several Projects are shown in Appendix D – Part I, yet Capital Expenditure calculations are not contained in Appendix D – Part II. Please explain.
  - e. Appendix D – Part II includes counts of connectors for the replacement cost as well as for the project cost. However, information on connectors is not included in Appendix D – Part I. Additionally, the LDAR database does not include all connectors. Please explain where WGR obtained the replacement and project connector counts in Appendix D – Part II.
6. **RFI #8:** Please indicate with specific time frames and dates, whether the Plant has ever been permitted as a major source under MACT HH and whether the Plant has ever been permitted as an area source under MACT HH. The EPA asked WGR to state whether the facility, or any portion of it, has ever been permitted as a major or area Subpart HH source. WGR indicated that the Plant is an area source, but did not provide the permitting history.
7. **RFI #10.** Please indicate if the Plant contains any of the affected facilities in 40 CFR 60.660(b) or whether any of the exemptions provided in 40 CFR 60.660(c) apply to the Plant. The EPA requested WGR to provide a detailed analysis indicating whether or not the Plant has any affected facilities under Subpart NNN<sup>3</sup> or Subpart RRR<sup>4</sup>. WGR indicated that the distillation that occurs at the Plant separates naturally occurring constituents (including ethane, propane and butane) in produced raw gas, which involves no synthesis prior to separation. WGR indicated that since the EPA’s initial development of Subpart NNN, the production of feedstock chemicals is distinct from

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<sup>3</sup> Subpart NNN refers to Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations.

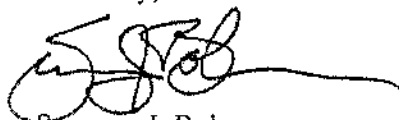
<sup>4</sup> Subpart RRR refers to Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.

their downstream use in the synthesis of organic chemicals. However, the plain reading of Subpart NNN does not indicate that Subpart NNN does not apply to the production of feedstock chemicals, or that it is only applicable to chemicals that are synthesized.

8. **RFI #11:** The EPA requested WGR to provide a demonstration showing that the 418 valves identified in Julia Jones' May 15, 2014 letter to the EPA contain less than 10% VOC. WGR stated that since all these valves continue to be monitored under the LDAR program a demonstration was not necessary as the valves are being tested pursuant to the regulatory requirements. Please provide documentation sufficient to demonstrate that the 418 valves handle materials that are less than 10% VOC.
9. Please identify whether you have withheld any Documents or portions of Documents otherwise responsive to the EPA's March 7, 2016 RFI on grounds of privilege. If so, identify the author of the Document, all recipients of the Document, the date the Document was created, the subject of the Document, the request that the Document is responsive to, and the grounds for the privilege asserted.

If you have any questions regarding this RFI, please contact Brenda Morris at (303) 312-6891.

Sincerely,



Suzanne J. Bohan  
Assistant Regional Administrator  
Office of Enforcement, Compliance  
and Environmental Justice

cc: (by electronic mail)

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